

PART 70 OPERATING PERMIT

OFFICE OF AIR MANAGEMENT

Aurora Casket Company, Inc.
10944 Marsh Road
Aurora, Indiana 47001

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 029-7636-00001	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary burial casket manufacturing source.

Responsible Official: William Barrott
Source Address: 10944 Marsh Road, Aurora, Indiana 47001
Mailing Address: P.O. Box 29, Aurora, Indiana 47001
SIC Code: 3995
County Location: Dearborn
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) scratch primer/sealer booth, known as EU-1, equipped with airless spray applicators and a waterwash curtain for overspray control, exhausting through Stack 1A, capacity: 30 burial caskets per hour.
- (b) One (1) primer booth #1, known as EU-2, equipped with airless spray applicators and a waterwash curtain for overspray control, exhausting through Stacks 2A and 2B, capacity: 30 burial caskets per hour.
- (c) One (1) primer booth #2, known as EU-3, equipped with electrostatic air atomized spray applicators and a waterwash curtain for overspray control, exhausting through Stacks 3A and 3B, capacity: 30 burial caskets per hour.
- (d) One (1) color booth, known as EU-4, equipped with high volume low pressure (HVLP) spray applicators and a waterwash curtain for overspray control, exhausting through Stacks 4A through 4D, capacity: 30 burial caskets per hour.
- (e) One (1) shade booth, known as EU-5, equipped with air atomization spray applicators and a waterwash curtain for overspray control, exhausting through Stacks 5A and 5B, capacity: 30 burial caskets per hour.
- (f) One (1) topcoat booth, known as EU-6, equipped with electrostatic air atomized spray applicators and a waterwash curtain for overspray control, exhausting through Stack 6A, capacity: 30 burial caskets per hour.

- (g) One (1) touchup booth, known as EU-7, equipped with air atomization spray applicators and dry filters for overspray control, exhausting through Stack 7A, capacity: 30 burial caskets per hour.
- (h) One (1) inspection/repair booth, known as EU-8, equipped with air atomization spray applicators and dry filters for overspray control, exhausting through Stacks 8A and 8B, capacity: 30 burial caskets per hour.
- (i) One (1) diesel fuel storage tank, installed in August 1990, capacity: 20,000 gallons.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface. [326 IAC 6-3-2]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2 and 326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per dry standard cubic foot per dry standard cubic foot per minute feet per dry standard cubic foot per minute feet per minute feet per actual cubic foot per minute feet per minute feet per minute foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute feet per minute feet per minute feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (e) Other activities or categories not previously identified:
 - (1) A six (6) stage washer [326 IAC 8-3-2 and 326 IAC 8-3-5]
 - (2) Miscellaneous machining [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection only for emergencies.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM,, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).
- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;

- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%), any one (1) six (6) minute averaging period as in determined 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;

- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results.

The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;

- (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) scratch primer/sealer booth, known as EU-1, equipped with airless spray applicators and a waterwash curtain for overspray control, exhausting through Stack 1A, capacity: 30 burial caskets per hour.
- (b) One (1) primer booth #2, known as EU-3, equipped with electrostatic air atomized spray applicators and a waterwash curtain for overspray control, exhausting through Stacks 3A and 3B, capacity: 30 burial caskets per hour.
- (c) One (1) color booth, known as EU-4, equipped with high volume low pressure (HVLP) spray applicators and a waterwash curtain for overspray control, exhausting through Stacks 4A through 4D, capacity: 30 burial caskets per hour.
- (d) One (1) shade booth, known as EU-5, equipped with air atomization spray applicators and a waterwash curtain for overspray control, exhausting through Stacks 5A and 5B, capacity: 30 burial caskets per hour.
- (e) One (1) topcoat booth, known as EU-6, equipped with electrostatic air atomized spray applicators and a waterwash curtain for overspray control, exhausting through Stack 6A, capacity: 30 burial caskets per hour.
- (f) One (1) touchup booth, known as EU-7, equipped with air atomization spray applicators and dry filters for overspray control, exhausting through Stack 7A, capacity: 30 burial caskets per hour.
- (g) One (1) inspection/repair booth, known as EU-8, equipped with air atomization spray applicators and dry filters for overspray control, exhausting through Stacks 8A and 8B, capacity: 30 burial caskets per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from spraying operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 Change or Modification [326 IAC 2-2]

Any change or modification which may increase potential emissions from these facilities shall obtain prior approval of IDEM, OAM pursuant to 326 IAC 2-2 before such change may occur.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Particulate Matter (PM)

The waterwash curtains and dry filters for PM control shall be in operation at all times when spray coating is in operation.

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters and waterwashes, weekly observations shall be made of the overspray from the surface coating booth stacks 1A, 1B, 3A, 3B, 4A through 4D, 5A, 5B, 6A, 7A, 8A, and 8B while these spray booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (i) One (1) diesel fuel storage tank, installed in August 1990, capacity: 20,000 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19][40CFR Part 60.110] [326 IAC 12]

D.2.1 Record Keeping Requirements

The Permittee shall maintain records at the source sufficient to demonstrate compliance with 40CFR Part 60.110b (NSPS Subpart Kb) and 326 IAC 12 for the 20,000-gallon diesel storage tank.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per dry standard cubic feet per actual cubic feet per minute foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (e) Other activities or categories not previously identified: A six (6) stage washer and Miscellaneous machining.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the grinding and machining operations shall not exceed the allowable PM emission rates based on the following equation(s):

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirement

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if these facilities are in compliance.

If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Aurora Caskets Company, Inc.
Source Address: 10944 Marsh Road, Aurora, Indiana 47001
Mailing Address: P.O. Box 29, Aurora, Indiana 47001
Part 70 Permit No.: T 029-7636-00001

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Aurora Caskets Company, Inc.
Source Address: 10944 Marsh Road, Aurora, Indiana 47001
Mailing Address: P.O. Box 29, Aurora, Indiana 47001
Part 70 Permit No.: T 029-7636-00001

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of Each Deviation

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Aurora Caskets Company, Inc.
Source Address: 10944 Marsh Road, Aurora, Indiana 47001
Mailing Address: P.O. Box 29, Aurora, Indiana 47001
Part 70 Permit No.: T 029-7636-00001

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(C)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**Indiana Department of Environmental Management
Office of Air Management**

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Aurora Casket Company, Inc.
Source Location:	10944 Marsh Road, Aurora, Indiana 47001
County:	Dearborn
SIC Code:	3995
Operation Permit No.:	T 029-7636-00001
Permit Reviewer:	Mark L. Kramer

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Aurora Casket Company relating to the operation of burial casket and shipping case manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) scratch primer/sealer booth, known as EU-1, equipped with airless spray applicators and a waterwash curtain for overspray control, exhausting through Stack 1A, capacity: 30 burial caskets per hour.
- (b) One (1) primer booth #1, known as EU-2, equipped with airless spray applicators and a waterwash curtain for overspray control, exhausting through Stacks 2A and 2B, capacity: 30 burial caskets per hour.
- (c) One (1) primer booth #2, known as EU-3, equipped with electrostatic air atomized spray applicators and a waterwash curtain for overspray control, exhausting through Stacks 3A and 3B, capacity: 30 burial caskets per hour.
- (d) One (1) color booth, known as EU-4, equipped with high volume low pressure (HVLV) spray applicators and a waterwash curtain for overspray control, exhausting through Stacks 4A through 4D, capacity: 30 burial caskets per hour.
- (e) One (1) shade booth, known as EU-5, equipped with air atomization spray applicators and a waterwash curtain for overspray control, exhausting through Stacks 5A and 5B, capacity: 30 burial caskets per hour.
- (f) One (1) topcoat booth, known as EU-6, equipped with electrostatic air atomized spray applicators and a waterwash curtain for overspray control, exhausting through Stack 6A, capacity: 30 burial caskets per hour.
- (g) One (1) touchup booth, known as EU-7, equipped with air atomization spray applicators and dry filters for overspray control, exhausting through Stack 7A, capacity: 30 burial caskets per hour.

- (h) One (1) inspection/repair booth, known as EU-8, equipped with air atomization spray applicators and dry filters for overspray control, exhausting through Stacks 8A and 8B, capacity: 30 burial caskets per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour.
- (c) Combustion source flame safety purging on startup.
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (f) The following VOC and HAP storage containers: vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (i) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

- (k) Closed loop heating and cooling systems.
- (l) Infrared cure equipment.
- (m) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (n) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (o) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (p) Paved and unpaved roads and parking lots with public access.
- (q) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (r) Other emergency equipment as follows:
 - Stationary fire pumps.
- (s) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (t) Other activities or categories not previously identified:
 - (1) Glue Booths
 - (2) Rope sealer
 - (3) A five (5) stage washer
 - (4) Miscellaneous machining

Existing Approvals

The source has been operating under the following approvals:

- (a) OP 15-08-89-0112, issued on April 14, 1987
- (b) OP 15-08-89-0113, issued on April 14, 1987
- (c) OP 15-08-89-0114, issued on April 14, 1987
- (d) OP 15-08-89-0115, issued on April 14, 1987
- (e) OP 15-08-89-0116, issued on April 14, 1987
- (f) OP 15-08-89-0117, issued on April 14, 1987

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996 with additional information received on February 3, 1998.

A notice of completeness letter was mailed to the source on January 13, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations, pages 1 through 4 of 4.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 100, less than 250
PM ₁₀	greater than 100, less than 250
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential Emissions (tons/year)
Xylene	greater than 10
Toluene	greater than 10
MEK	greater than 10
Triethylamine	less than 10
Glycol ethers	greater than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of volatile organic compounds and PM₁₀ are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects data from the 1994 HAPs OAM emission inventory and data from the AIRS Facility Subsystem Quick Look Report dated July 24, 1997.

Pollutant	Actual Emissions (tons/year)
PM	0.308
PM ₁₀	0.007
SO ₂	0.028
VOC	285
CO	0.013
NO _x	0.060
Chlorine	0.09

Pollutant	Actual Emissions (tons/year)
Diethanolamine	0.006
Ethyl benzene	0.01
Ethylene glycol	0.28
Formaldehyde	0.04
Methanol	0.82
MEK	5.51
Methyl methacrylate	0.15
Methylene chloride	0.15
2-Nitropropane	0.37
Phosphorus	0.15
Tetrachloroethylene	0.01
Toluene	11.69
Trichloroethylene	0.37
Vinyl acetate	0.14
Xylenes	0.36
Glycol ethers	0.79

Potential to Emit After Controls

The table below summarizes the total potential to emit after controls of the significant emission units.

	Potential to Emit After Controls (tons/year)						
Process/ facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating Operations EU1 - EU8	2.86	2.86	0.00	587	0.00	0.00	387
Insignificant Activities	10.0	10.0	1.00	10.00	15.0	30.0	5.00
Total Emissions	12.9	12.9	1.00	597	15.0	30.0	392

County Attainment Status

The source is located in Dearborn County.

Pollutant	Status
TSP	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Dearborn County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60 applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63 applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of significant deterioration)

This source is an existing major source since potential VOC emissions exceed 250 tons per year. This source did not go through PSD review since the 1969 construction date of all the significant facilities pre-dates the PSD applicability date of August 7, 1977. The emissions from any future modifications will be subject to the PSD significant levels.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC in Dearborn County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process operations: particulate emission limitations)

The spraying operations are subject to the hourly particulate matter (PM) limitations of this rule.

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

326 IAC 8-2-9 (Surface coating emission limitations: miscellaneous metal coating operations)

The surface coating booths are exempt from the requirements of this rule because of the exemption provided for metal burial caskets in 326 IAC 8-2-9.

326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities)

The source was constructed in 1969 prior to the January 1, 1980 applicability date for this rule. Therefore, the requirements of this rule are not applicable.

326 IAC 8-6 (Organic solvent emission limitation)

The source was constructed in 1969 prior to the October 7, 1974 applicability date for this rule. Therefore, the requirements of this rule are not applicable.

There are no other 326 IAC 8 rules that apply.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The surface coating operations have applicable compliance monitoring conditions as specified below:

The amount of VOC, any single HAP delivered to the applicators, and the amount of any combination of HAPs delivered to the applicators including cleanup solvents must be monitored and recorded on a monthly basis. This information must be reported to OAM on a semi-annual basis. Material Data Safety Sheets (MSDS) must be kept on file for each coating and cleanup solvent used during each quarter.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) See attached calculations on page 3 and 4 of 4 of Appendix A for detailed air toxic calculations.

Conclusion

The operation of this burial casket and shipping case manufacturing source shall be subject to the conditions of the attached proposed Part 70 Permit No. T 029-7636-00001.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Aurora Casket Company, Inc.
 Source Location: 10944 Marsh Road, Aurora, Indiana 47001
 County: Dearborn
 Part 70 Operating Permit: OP T 029-7636-00001
 SIC Code: 3995
 Permit Reviewer: Mark L. Kramer

On February 24, 1998, the Office of Air Management (OAM) had a notice published in the Register Publications, Lawrenceburg, Indiana, stating that Aurora Casket Company, Inc. had applied for a Part 70 Operating Permit to operate a burial casket source. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

1. Section A (Source Summary) has been changed as follows:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and ~~presented in the permit application.~~ **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

2. Condition A.5 (Prior Permit Conditions Superseded) has been deleted. Language has been added to Condition B.14 (Permit Shield) to address the effect of prior permit conditions.

~~A.5 — Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

SECTION B

GENERAL CONDITIONS

3. Condition B.1 (Permit No Defense) part (b) of the condition has been changed as follows:

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

4. Condition B.8 (Duty to Supplement and Provide Information) part (c) of the condition has been changed as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

5. Condition B.11 (Annual Compliance Certification) part (c) has been changed to the following:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); **and**
 - (5) Any insignificant activity that has been added without a permit revision; and**
 - ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

~~The notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

6. Condition B.12 (Preventive Maintenance Plan) has been changed as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement the Preventive Maintenance Plan** does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. **IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.**

7. Condition B.14 (Permit Shield) has been changed as follows:

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

~~(a)~~ (b) **This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided **that either** ~~of the following:~~

- (1) The applicable requirements are included and specifically identified in this permit; **or**

- (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof. The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~
- (b) (c) ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- (e) (d) ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.~~
- (d) (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

- ~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

8. Condition B.16 (Deviations from Permit Requirements and Conditions) has been changed as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.**
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- ~~(b)~~ **(c)** Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- ~~(e)~~ **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

9. Condition B.18 (Permit Renewal) part (a) has been changed as follows:

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

10. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have all been combined into a new Condition B.19 (Permit Amendment or Modification) as follows. Conditions B.20 and B.21 have been deleted and the remainder of Section B has been renumbered. The new B.19 condition reads as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**

- (b) **Any application requesting an amendment or modification of this permit shall be submitted to:**

**Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) **The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

11. Condition B.26 (now B.24) (Inspection and Entry) has removed “IDEM”, since Local Agencies do not have IDEM identification cards. Also, part (e)(1) and (e)(2) have been added.(only if not already there)

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of **IDEM proper** identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such**, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

12. Condition B.27 (now B.25) (Transfer of Ownership or Operation) part (b) has been changed as follows:

B.27 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

13. Condition B.28 (now B.26) (Annual Fee Payment) has been changed as follows:

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.**
- (b) ~~Failure~~ **Except as provided in 326 IAC 2-7-19(e),** failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

SECTION C SOURCE OPERATION CONDITIONS

14. Condition C.1 has been changed as follows:

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) **and 40 CFR 52.21**, this source is a major source.

15. Condition C.2 (Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour) has been added and the remaining conditions have been renumbered accordingly.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

16. Condition C.3 has been updated to reflect the revision in 326 IAC 5-1-2 dated November 1, 1998. as follows:

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ opacity shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

17. Condition C.6 (now C.7) (Operation of Equipment) has been changed as follows:

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation. ~~as described in Section D of this permit.~~

18. Condition C.7 (now C.8) (Asbestos Abatement Projects- Accreditation) and Condition C.12 (Asbestos Abatement Projects) have been combined into one condition as follows:

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) **Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.**
- (b) **The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**
 - (1) **When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or**
 - (2) **If there is a change in the following:**
 - (A) **Asbestos removal or demolition start date;**
 - (B) **Removal or demolition contractor; or**
 - (C) **Waste disposal site.**

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

19. Condition C.8 (now C.9) (Performance Testing) has had the rule cite changed to 326 IAC 3-6 and the following language has been added:

C.8 Performance Testing ~~[326 IAC 3-2.1]~~ **[326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2.1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing ~~methods~~ **any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the ~~Commissioner,~~ **IDEM, OAM** if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

20. Condition C.9 (now C.10) (Compliance Schedule) has been changed as follows:

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

21. Condition C.10 (now C.11) (Compliance Monitoring) has been changed as follows:

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. **All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.** The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, **that equipment cannot be installed and operated within ninety (90) days**, the Permittee **may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee shall** notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule no more than ninety (90) days** after receipt of this permit, with full justification of the reasons for the inability to meet this date. ~~and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

22. Condition C.11 (now C.12) (Monitoring Methods) has been changed as follows:

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing **required by Section D** performed to meet the requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

23. Condition C.12 (Asbestos Abatement Projects) has been deleted and has been incorporated into the revised Condition C.8 (Asbestos Abatement Projects).

~~C.16 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]~~

~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos-containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~

~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~

~~(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or~~

~~(2) If there is a change in the following:~~

~~(A) Asbestos removal or demolition start date;~~

~~(B) Removal or demolition contractor; or~~

~~(3) Waste disposal site.~~

~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~

~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

~~All required notifications shall be submitted to:~~

~~Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~(e) Procedures for Asbestos Emission Control~~

~~The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

(f) ~~Indiana Accredited Asbestos Inspector~~

~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.~~

24. Condition C.13 (Emergency Reduction Plans) has been changed as follows:

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

25. Condition C.14 (Risk Management Plan) has been changed as follows:

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

26. Condition C.15 (Compliance Monitoring Plan - Failure to Take Response Steps) has had the following rule cites added:

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)][**326 IAC 2-7-6] [326 IAC 1-6]**

27. Condition C.16 (Actions Related to Noncompliance Demonstrated by a Stack Test), has had the rule cites added to the title and following language added:

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [**326 IAC 2-7-5]**
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

28. Condition C.17 (Emission Statement) part (a) has been changed as follows:

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)]
[326 IAC 2-6]

- (a) The Permittee shall submit ~~an certified~~ annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

29. Condition C.19 (General Record Keeping Requirements) has been changed as follows:

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)][**326 IAC 2-7-6**]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

(c) Support information shall include, where applicable:

- (1) Copies of all reports required by this permit;
- (2) All original strip chart recordings for continuous monitoring instrumentation;
- (3) All calibration and maintenance records;
- (4) Records of preventive maintenance shall be sufficient to demonstrate that ~~improper maintenance~~ **failure to implement the Preventive Maintenance Plan** did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

30. Condition C.20 (General Reporting Requirements) has had the word "Quality" changed to "Quarterly", and the following language has been added:

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a ~~Quarterly~~ **Semi-annual Compliance Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any **semi-annual** report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
 - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
 - ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
 - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.1 FACILITY OPERATION CONDITIONS

31. Section D (Facility Operation Conditions) has had the following language added to the facility description box in all Section Ds

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

32. Conditions D.1.4, and D.3.4 (Testing Requirements) have been changed as follows.

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test~~ this facility is not specifically required by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required by IDEM, compliance with the **PM** limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

33. Condition D.1.5 (Volatile Organic Compounds) has been deleted since there are no VOC limits in the Section D.1.

~~**D.1.5 Volatile Organic Compounds (VOC)**~~

~~Compliance with the VOC usage limitations Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

34. Condition D.1.7 (Monitoring) (now D.1.6) has been changed as follows.

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, **weekly** ~~daily~~ observations shall be made of the overspray **from the surface coating booth stacks 1A, 1B, 3A, 3B, 4A through 4D, 5A, 5B, 6A, 7A, 8A, and 8B** while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) **Monthly** ~~Weekly~~ inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when ~~an overspray emission, evidence of overspray emission, or other abnormal emission~~ **a noticeable change in overspray emission, or evidence of overspray emission** is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Forms

35. In the Certification Form, the words "Emergency/Deviation Occurrence Reporting Form" have been deleted as shown in form as follows.
36. The Quarterly Compliance Report is now called the **Semi-Annual** Compliance Monitoring Report, the column marked "No Deviations" has been deleted and the language has been changed as indicated in the following pages.

37. The Emergency/Deviation Occurrence Reporting Form has had the phrase "Attach a signed certification to complete this report" deleted from the bottom of the second page. The changes are shown in the following pages.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Aurora Caskets Company, Inc.
Source Address: 10944 Marsh Road, Aurora, Indiana 47001
Mailing Address: P.O. Box 29, Aurora, Indiana 47001
Part 70 Permit No.: T 029-7636-00001

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☒ ~~Emergency/Deviation Occurrence Reporting Form~~

☐ Test Result (specify) _____

☐ Report (specify) _____

☐ Notification (specify) _____

☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

~~Attach a signed certification to complete this report.~~

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Aurora Caskets Company, Inc.
Source Address: 10944 Marsh Road, Aurora, Indiana 47001
Mailing Address: P.O. Box 29, Aurora, Indiana 47001
Part 70 Permit No.: T 029-7636-00001

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted **semi-annually**. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations": **in the box marked "No deviations occurred this reporting period"**.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

On March 26, 1998, Carolyn Auburn of Aurora Casket Company, Inc. submitted comments on the proposed Part 70 Operating Permit. The comments are as follows:

Comment 1:

Table of Contents, Facility Operations Conditions (D.1, pg. 3)

The Table of Contents lists Aurora Casket utilizing two paint booths identified as PB1 and PB2. Aurora Casket utilizes a total of eight paint booths identified elsewhere in the draft permit as EU-1 - EU-8. This line in the Table of Contents should be corrected accordingly.

Response 1:

The Table of Contents had been corrected to indicate eight (8) paint booths (EU-1 - EU-8). See Comment and Response 43 for additional change.

Comment 2:

Source Summary, General Information (A.1, pg. 4)(now, pg. 5)

The Source Summary states "The Permittee owns and operates a stationary burial casket and shipping case manufacturing source." We request the words "and shipping case" to be removed from this paragraph, since Aurora Casket does not manufacture shipping cases.

Response 2:

The description of the source has been changed to a stationary burial casket ~~and shipping case~~ manufacturing source.

Comment 3:

Emissions Units and Pollution Control Summary (A.2, pg. 4)(now, pg. 5)

Aurora Casket would like to know if IDEM intends the capacity (i.e., 30 caskets per hour) stated with each facility (emission unit) to be for informational purposes or if this is to be an enforceable term/limit of our permit, particularly in Section D. If the capacity is provided for informational reasons only and is not an enforceable limit, we request that it be removed from the draft permit. If this capacity is to be an enforceable limit, we request an explanation of why this capacity would be an enforceable limit in our permit for our plant and concurrently this information would require correction. Aurora Casket does not believe that the reference to capacity of each emission unit should be an enforceable limit in the permit for our plant.

Also, we would like to know if the spray gun technology listed with each facility (emission unit) is for informational purposes only or if IDEM intends this to be an enforceable term/limit of our permit. If this description is provided for reasons other than enforceability, we request that it be removed from the permit. If this is an enforceable term/limit, we request an explanation of why this would be an enforceable condition and concurrently this information would require correction. Aurora Casket does not believe that the reference to spray gun technology should be an enforceable condition in the permit.

Response 3:

Please note that Section A has been changed to: "The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application."

The application forms for the Part 70 permit requested the "maximum number of production units per hour." This production capacity is the basis for determining applicability with the rules that establish emission limitations, permitting requirements and other requirements reflected in this permit. Although the capacity of the emission units is not an enforceable limit, any change in equipment including increased capacities may trigger new requirements or require prior approval from IDEM, OAM. In order to identify addition equipment or modification of existing equipment, the equipment list must specify the quantity of a given type of equipment and their capacities.

Although, Aurora Caskets has requested that the capacity be deleted from all emission units, this is IDEM's tracking mechanism to determine if in fact there has or has not been such a change.

Comment 4:

Specifically Regulated Insignificant Activities (A.3, pg. 5)(now, pg. 6)

Although Aurora Casket does not operate insignificant activities that are subject to NSPS and NESHAP requirements, we do have other insignificant activities that do result in air emissions that are not listed in the permit. Insignificant activities are listed only on pages two and three of the Technical Support Document. Do these insignificant activities also need to be listed in the permit itself? What is the affect of not identifying these insignificant activities in the permit itself? Please clarify whether these insignificant activities should also be listed in the permit.

Response 4:

The Title V Operating Permit rules require that the permit identify all applicable requirements. While the rules require that the application include insignificant activities, the OAM ordinarily includes them only when necessary to identify a specific applicable requirement. Although there were no insignificant activities that had applicable NESHAP or NSPS, IDEM, OAM decided to include those insignificant activities listed in the Technical Support Document that have applicable state rules in Section A.3 of the permit and added Section D.3 to address these insignificant activities with cites. Section A.3 now reads:

A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface. **[326 IAC 6-3-2]**
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. **[326 IAC 8-3-2 and 326 IAC 8-3-5]**

- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. **[326 IAC 6-3-2]**
- (d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per dry standard cubic feet per dry standard cubic feet per minute feet per dry standard cubic feet per minute feet per minute feet per actual cubic feet per minute feet per minute feet per minute foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute feet per minute feet per minute feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. **[326 IAC 6-3-2]**
- (e) Other activities or categories not previously identified:
 - (1) A six (6) stage washer **[326 IAC 8-3-2 and 326 IAC 8-3-5]**
 - (2) Miscellaneous machining **[326 IAC 6-3-2]**

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per dry standard cubic feet per dry standard cubic feet per minute feet per actual cubic feet per minute feet per minute foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute feet per minute feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (e) Other activities or categories not previously identified: A six (6) stage washer and Miscellaneous machining.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;

- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

- (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the grinding and machining operations shall not exceed the allowable PM emission rates based on the following equation(s):

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirement

D.3.4 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Comment 5:

Certification (B.10, pg. 7)(now, pg. 8)

We request that only one certification be submitted with any application form, report or compliance certificate submitted under this permit. In other words, if more than one report must be submitted at a given time, only one certification should be submitted with these reports. The language in the paragraph is ambiguous and we request that it be clarified accordingly.

Response 5:

According to item (b) of Condition B.10 which is "One (1) certification shall be included, on the attached Certification Form, with each submittal." states that only one (1) certification is needed with each submittal, regardless of the number of forms, reports or certificates included.

Comment 6:

Annual Compliance Certification (B.11 (c)(3), pg. 8)

This paragraph states that Aurora Casket must certify annually whether compliance with the terms and conditions in the permit was continuous or intermittent for the preceding year of operation. As set forth in this permit, compliance is to be determined by daily and weekly inspections and monthly record keeping. Would Aurora Casket be considered in continuous compliance as long as we satisfy the inspections and record keeping requirements set forth in D.1.6, D.1 7, and D.1.8 of the draft permit? It would be helpful if IDEM could provide a list of terms and conditions in this permit which are to be addressed by the annual compliance certification report as referenced in subparagraph B.11(c)(1).

Finally, is IDEM, OAM requiring Aurora Casket to annually certify opacity readings when they are not expressly stated in the permit?

Response 6:

See revised wording in Item 5. for Condition B.11.

Consistent with a recent Federal interpretation and clarifying amendment to the Federal Title V rule provision, this provision refers to the type of data used to certify compliance. The data used in the certification will depend on the individual applicable requirement. The data collected under each compliance determination and each compliance monitoring condition will most likely form the basis for the compliance certification. IDEM is currently revising Nonrule Policy Document 007 so that it includes guidance on the submittal of an annual compliance certification for Title V permits.

Comment 7:

Preventive Maintenance Plans (B.12, pg. 8)(now, pg. 9)

It is unclear in subparagraph (a)(2) of paragraph B.12 what "items or conditions" must be inspected. The terms "items or conditions" are not defined in the draft permit. We believe that the Preventive Maintenance Plans address any emissions control equipment associated with the emissions units listed in paragraph A.2 and paragraph D.1 of the draft permit. We request Paragraph B.12 be revised to specify that the Preventive Maintenance Plans apply only to the emissions units with emissions control equipment.

Subparagraph (c) states that the Preventive Maintenance Plans shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. We note that Preventive Maintenance Plans were submitted as part of our Part 70 operating permit application for all emission units with control equipment. Has IDEM reviewed and approved these Plans as part of its issuance of this draft permit?

Response 7:

See revised wording in Item 6. for Condition B.12.

Paragraph B.12 applies specifically to those Section D conditions that require a Preventive Maintenance Plan. IDEM reviewed the Plan, but as part of the Part 70 Permit does not specifically approve the Plan at the time the permit is issued. If plan is requested by IDEM to review, then it will be thoroughly reviewed and subject to approval.

Comment 8:

Emergency Provisions (B.13, pg. 9)(now, pg. 10)

It appears this paragraph of the permit mirrors the referenced regulations and seems to apply to emissions units with health-based and technology-based limits. Aurora Casket does not believe that the draft permit contains any health or technology-based limits with the possible exception of the PM standards stated in paragraph D.1.1. Aurora Casket requests confirmation of this from IDEM. In addition, we would like to clarify that the inclusion of this paragraph in our permit does not impose any additional monitoring requirements not expressly stated in Section D of the permit.

Finally, considering the inspections and record keeping required by our permit, as opposed to emissions limits, **Aurora Casket feels that paragraph is not appropriate and does not apply to our current situation.** If IDEM feels this paragraph is applicable to our plant, Aurora Casket requests an explanation as to how this would apply at Aurora Casket.

Response 8:

IDEM confirms that the permit does not contain any health- or technology-based limits other than those stated in Condition D.1.1 and the new Section D.2.1. IDEM confirms that inclusion of this paragraph in your permit does not impose any additional monitoring requirements not expressly stated in Sections C and D of the permit.

Comment 9:

Deviations from Permit Requirements (B.16, pg. 11)(now, pg. 13)

We are unclear what constitutes "permit requirements" in this paragraph. This is extremely vague and potentially a very broad term. We believe the proper interpretation of the term "requirements" to be the facility operation conditions set forth in Section D of the draft permit and not to be every conceivable obligation or condition in the entire permit. We request that the permit be modified accordingly to specify what constitutes permit "requirements" subject to deviation reporting. We also request clarification of what constitutes a "deviation" of permit requirements subject to reporting pursuant to this paragraph.

Finally, subparagraph (a) should be clarified to specify that the notice submitted under 326 IAC 2-7-16 only applies to emergencies.

Response 9:

See revised wording in Item 8. for Condition B.16.

Item (d) has been revised to:

- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection **only for emergencies.**

Comment 10:

Inspection and Entry (B.26, pg. 16)(now B.24, pg. 17)

Aurora Casket requests that information obtained during an IDEM, OAM inspection be treated as confidential to the maximum extent permitted by Indiana laws and regulations. Aurora Casket requests that the permit be modified to reflect this.

Response 10:

See revised wording in Item 11. for Condition B.26.

To respond to your concerns for confidentiality, the following has been added to Condition B.26 (now B.24):

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

Comment 11:

Opacity (C.2, pg. 18)(now C.3, pg. 20)

Since there is no compliance monitoring requirement imposed on Aurora Casket relating to the opacity limitations in Section D of the permit, Aurora Casket would like confirmation that this paragraph does not impose a monitoring requirement on Aurora Casket with regards to opacity.

Response 11:

The entire source is subject to the opacity limits specified in Section C, but no monitoring of opacity is required in Section D of the permit. However, the source is required to be in compliance with Condition C.2 (now C.3).

Comment 12:

Open Burning, Incineration, Asbestos Abatement Projects (C.3, C.4 and C.7, pg. 18)(now C.4, C.5, and C.8, pg. 20, 20, and 21, respectively)

Aurora Casket does not understand why items dealing with open burning, incineration, and asbestos abatement projects are terms/conditions of our draft permit. Aurora Casket does not engage in these activities, and they are already regulated by IDEM rules. Aurora Casket requests an explanation of why these paragraphs are in our permit. Aurora Casket requests that these paragraphs be removed from the permit. For example, Aurora Casket notes that air permits are not required for an asbestos abatement project, just compliance with applicable regulations. Thus, why would this activity be a term in our permit?

Response 12:

Condition C.3 (now C.4) states, "The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2." The condition is a general prohibition against improper incineration that applies to all sources, whether the source has incinerators or not. Waste material can only be burned in equipment that meets the cited requirements. Pursuant to 326 IAC 2-7-5, the permit must include all applicable requirements. The condition is not changed.

Although these operations may not be part of normal operation, these conditions regulate possible open burning, etc., that can take place at any source and, thus are included in all permits.

Comment 13:

Performance Testing (C.8, pg. 19)(now C.9 pg. 22)

Aurora Casket would like to clarify that no performance testing is required by this permit. Also, if performance testing were to become a requirement in the future, that any such testing would be expressly contained in Section D in our permit. Aurora Casket requests that this paragraph be revised accordingly.

Response 13:

See revised wording in Item 19. for Condition C.8 and Item 32.

Testing Requirements are specified for example in Section D.1 and at this time states that if testing is required, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on these facilities under 326 IAC 2-7-5 and 326 IAC 2-7-6. Condition C.8 (now C.9) is therefore necessary, should IDEM request that testing be performed in the future.

Comment 14:

Compliance Monitoring Requirements/Compliance Schedule (C.9, pg. 19)(now C.10, pg. 22)

Subparagraphs (a) and (b) of paragraph C.9 (now C.10) use the term "such requirements" and Aurora Casket would like clarification of this term. We understand this term to refer only to requirements set forth in Section D of the permit, but the permit is ambiguous on this point.

Response 14:

Condition C.9 (now C.10) has been changed as shown in Item 21.

Comment 15:

Compliance Monitoring (C.10, pg. 19)(now C.11, pg. 22)

This paragraph states "compliance with applicable requirements shall be documented as required by this permit." This is a very vague and potentially broad statement. Aurora Casket requests this sentence be modified to state "compliance with applicable requirements shall be documented as required by paragraph D.1.7 of this permit."

Aurora Casket believes no compliance monitoring is required under this permit, other than daily and weekly inspections of the dry filters and stacks as set forth in paragraph D.1.

Response 15:

Condition C.10 (now C.11) has been changed as stated in Item 21.

This condition applies to compliance with all applicable requirements stated in the permit and not just Condition D.1, e.g., Conditions C.9, C.11, C.12, C.13, C.16, C.17 and C.22. (now Conditions C.10, C.12, C.8, C.13, C.16, C17, and C.21)

Comment 16:

Maintenance of Compliance Monitoring Equipment (C.11, pg. 20)

Aurora Casket believes that this paragraph is not applicable to our current permit given that no monitoring equipment is required. If this were to become applicable, we would expect that the monitoring equipment would be specified in Section D of the permit. Aurora Casket requests that this paragraph be modified accordingly.

Response 16:

This condition has been deleted since there is no required monitoring equipment.

Comment 17:

Monitoring Methods (C.12, pg. 20)(now, pg.23)

Aurora Casket believes that this paragraph does not apply to us given that no monitoring or testing is required. Accordingly, Aurora Casket requests that paragraph C.12 (now C.13) be revised as follows: "Any monitoring or testing required by Section D of this permit shall, to the extent applicable, be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit."

Response 17:

This condition is mandatory for all Part 70 permits, regardless if it applies or not and is not limited to conditions specified in Section D and see revision of the wording in Item 22.

Comment 18:

Asbestos Abatement (C.13, pg. 20)(now C.8, pg. 20)

Aurora Casket requests an explanation of why a paragraph on asbestos abatement projects is contained in the permit for the plant. Aurora Casket believes that there is no asbestos present at this facility and, more importantly, air permits are not required for the removal of any such asbestos. We request this paragraph of the permit be deleted.

Response 18:

326 IAC 14-10 requires a thorough inspection of the affected facility or part of the facility by an Indiana accredited asbestos inspector. It is unlikely that a source would find it cost-effective to have an entire property thoroughly inspected for asbestos. Only schools with students in any grade from kindergarten through grade 12 are required to have a thorough inspection of the entire property. Thorough inspection includes analysis of any material that may contain asbestos. This could include cement walls, linoleum floor covering and counter tops, ceiling and wall panels, roofing, pipe wrap, and more. In addition, there would be no assurance that no asbestos-containing material has been added since the inspection. Many materials currently on the market are legally allowed to contain asbestos. Finally, asbestos-containing material that was determined at one time to be non-friable may deteriorate with time and become friable. Pursuant to 326 IAC 2-7-5, the permit must include all applicable requirements. This condition has been deleted and incorporated into Condition C.8, see Item 18.

Comment 19:

Risk Management Plans (C.15, pg. 22)(now C.14, pg. 24)

Aurora Casket requests an explanation of why the U.S. EPA Risk Management Plan requirements are incorporated into the permit. This is not an air emissions permit issue. If Aurora Casket were subject to these requirements, it would simply comply with the applicable rules. There is no need to have a separate obligation to comply with these rules as a term of the permit. Aurora Casket believes this paragraph should be deleted.

Response 19:

The Risk Management Plan provision does not state that the Permittee has more than the threshold quantity of a regulated substance. The provision may be applicable if the Permittee does meet the threshold at a some time in the future. The condition remains in the permit. See Item 25 for change in wording. Pursuant to 326 IAC 2-7-5, the permit must include all applicable requirements.

Comment 20:

Compliance Monitoring Plan (C.16, pg. 22)(now C.15, pg. 24)

Aurora Casket would like an explanation of the term "continuous compliance with applicable requirements" in subparagraph (a) given the inspections and record keeping requirements set forth in Section D of this permit.

Aurora Casket does not understand what is required with respect to the Compliance Response Plan referred in subparagraph (a)(5). The only compliance monitoring required of Aurora Casket is daily inspections of the filters and weekly inspections of the stacks, but there are no emissions limits applicable to these units. Thus, what is the purpose of the Compliance Response Plan?

Aurora Casket requests an explanation of the term "compliance monitoring condition" as stated in paragraph C.16(b).

Response 20:

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the Permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of specification situation," and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the Permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was in violation of the permit. The concern was that a Permittee's PMP might call for the Permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the Permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP.

Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the Permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the Permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most Permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The Permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the permittee may know from experience, what replacement parts should be kept on hand. The permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The Permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the Permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's troubleshooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the troubleshooting guide and the permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A Permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the Permittee's business process.

The Compliance Response Plan (CRP), for example, would include items such as:

- (a) If a filter is found to be improperly positioned, put it in its proper position.
- (b) If a filter is found to have a tear or is clogged, replace it with a new filter.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance. There are no changes in the condition.

Comment 21:

Actions Related to Non Compliance Demonstrated by a Stack Test (C.17, pg. 23)(now, C.16, pg. 25)

Aurora Casket believes that this paragraph is not applicable since stack testing is not required by our permit. We request a confirmation of this. In addition, if stack testing were to be required in the future, we would expect it to be specifically set forth in Section D of the permit. Aurora Casket requests that this paragraph be modified accordingly.

Response 21:

Presently, IDEM has not requested stack testing, but in the future, if IDEM desires to determine compliance with the particulate matter limit specified in Condition D.1.1, then a performance test can be requested and shall be conducted in accordance with Section C - Performance Testing. However, since performance testing may be required, the permit must address what happens if non-compliance is demonstrated. Thus, the condition remains with the wording revisions noted in Item 27.

Comment 22:

General Record Keeping Requirements (C.20, pg. 25)(now C.19, pg. 27)

Aurora Casket requests paragraph (a) be revised to state "These records should be kept at the source location and available within a reasonable amount of time."

This paragraph discusses the records of "required monitoring". Aurora Casket would like to confirm that there are no monitoring requirements stated in this permit other than those in paragraph D.1.7. As such, we believe that virtually this entire paragraph does not apply to us.

Response 22:

Condition C.20 requires that records necessary to document compliance be kept at the source for a period of three (3) years, and then may be stored elsewhere for the next two (2) years provided the records can be made available within thirty (30) days after written request. Because the most recent three years worth of records must be kept at the source, it is reasonable to assume that such records can be produced within a short time frame when OAM staff requests such data. In OAM's experience, practical requests for compliance related records can be made available within one hour. 326 IAC 2-7-6(2) states that the Permittee shall allow access to records when the inspector arrives at the source. Therefore, no change is necessary to the permit. See Item 29 above.

Comment 23:

General Reporting Requirements (C.21, pg. 26)(now C.20, pg. 28)

Subparagraph (d) of paragraph C.21 (sic) (C.20) and subparagraph (g) of paragraph C.21 seem to be inconsistent. If record keeping need not commence until 90 days of permit issuance, the first quarterly compliance report should not be required until after that date. Also we would like to know if the quarterly reports cover calendar quarters or if the quarters begin from the date of issuance of the permit.

Response 23:

Since no quarterly reports are required in Section D, the apparent inconsistency is not relevant to this permit. When reporting is required, the first report should include the period from the date of issuance until the end of the calendar quarter in which the permit is issued. The quarterly reports correspond to calendar quarters. Condition C.20 is included as a standard condition to simplify future permit amendments.

Comment 24:

Stratospheric Ozone Protection (C.22, pg. 27)(now C.21, pg. 28)

Aurora Casket requests an explanation of why provisions in the regulations on protection of stratospheric ozone are contained in our permit. Aurora Casket requests this paragraph be removed from the permit since it is not applicable to the activities being conducted under this permit.

Response 24:

40 CFR 82 regulates the handling of ozone-depleting substances such as Freon in a variety of processes and products including domestic and commercial refrigeration and air-conditioning units and portable fire extinguishers. Most sources include one or more of these subject units. Maintenance or repair of such units has the potential to release substances controlled under these rules.

Pursuant to 326 IAC 2-7-5, the permit must include all applicable requirements. Therefore, the condition remains unchanged.

Comment 25:

Facility Operation Conditions (D.1, pg. 28)(now, pg. 30)

As requested above, Aurora Casket would like to know if the capacity description stated with each facility (emission unit) is for information purposes only or if IDEM intends this to be an enforceable term/limit with respect to our permit. If this description is provided for information reasons and is not an enforceable limit, we request that it be removed from the permit. If this is an enforceable term/limit, we request an explanation of why this would be an enforceable limit and concurrently this description would need correction.

Also, we would like to know if the spray gun technology listed with each facility (emission unit) is for informational purposes or if this is an enforceable term/limit of our permit. If this description is provided for reasons other than enforceability, we request that it be removed from the permit. If this is an enforceable term/limit, we request an explanation of why this would be an enforceable condition and concurrently this information would need correction.

Response 25:

See response to Comment 3 above. The spray gun technology also bears on the potential PM emissions and therefore, no change to the permit is necessary.

Comment 26:

Particulate Matter (D.1.1, pg. 28)(now, pg. 30)

There appears to be an equation missing after the first sentence in this paragraph. Aurora Casket requests that IDEM modify the permit to include the correct equation to be used here.

Response 26:

The equation is stated after the interpolation and extrapolation and is $E = 4.10 P^{0.67}$.

Comment 27:

Change or Modification (D.1.2, pg. 28)(now, pg. 30)

The term "these facilities" is ambiguous in paragraph D.1.2. Aurora Casket would like to clarify that this paragraph applies only to those emission units listed in Section D.1.

Response 27:

Correct, these facilities apply to those emission units listed in Section D.1.

Comment 28:

Preventive Maintenance Plan (D.1.3, pg. 29)(now, pg. 30)

Aurora Casket believes that Preventive Maintenance Plans apply only to control devices used on facilities (emission units) and not the facilities themselves. In addition, we request that this paragraph be clarified such that "these facilities" refer emission units set forth in Section D of the permit.

Response 28:

Pursuant to 326 IAC 2-7-4(c)(9) (Permit Application), confirmation that the source maintains onsite a Preventive Maintenance Plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-7-5(13) (Permit Content), a provision that requires the source to do all of the following must be included in each Part 70 permit:

- (1) Maintain onsite the Preventive Maintenance Plan as required under 326 IAC 2-7-4(c)(9);
- (2) Implement the Preventive Maintenance Plan; and
- (3) Forward to the department upon request the Preventive Maintenance Plan.

The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits). IDEM's compliance monitoring guidance states that a compliance monitoring plan is required only for:

- (1) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
- (2) the unit has existing applicable requirements; and
- (3) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
- (4) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (5) **the unit does not have a control device and has actual emissions exceeding 25 tons per year** (emphasis added).

The guidance does not state that if a facility does not meet the above requirements, compliance monitoring will never be necessary. It does state that a Compliance Monitoring Plan is not required to be submitted with the application. In most cases, the requirement to maintain a Preventive Maintenance Plan and perform compliance monitoring has followed the same guidelines as specified above. However, there are some types of operations (i.e., woodworking) that the OAM has determined that compliance monitoring and preventive maintenance plans are necessary to ensure continuous compliance.

Since the allowable and actual VOC emissions exceed 25 tons per year without a control device, a PMP plan is required for the facilities listed in Section D.1.

Comment 29:

Volatile Organic Compounds (VOC) (D.1.5, pg. 29)(now, pg. 31)

Aurora Casket requests that the last sentence be removed from this paragraph since casket manufacturers are exempt from this rule as stated in 326 IAC 8-2-9.

Response 29:

Although Aurora Caskets is exempt from 326 IAC 8-2-9, the VOC and HAPs usage needs to be determined annually by the methods specified and furthermore reserves the right to test the coatings for verification.

Comment 30:

Particulate Matter (D.1.6, pg. 29)(now, pg. 31)

We believe a typo exists in this paragraph, as there are multiple water curtains. The paragraph should read "The water wash curtains and dry filters for PM control shall be in operation at all times when spray coating is in operation." In addition, why is paragraph D.1.6 in a section on "compliance monitoring requirements"? This paragraph is more relevant to emissions control than compliance monitoring.

Response 30:

Condition D.1.6 has been changed to "The water wash curtains and dry filters for PM control shall be in operation at all times when spray coating is in operation." The condition relates to compliance and thus remains in this subsection.

Comment 31:

Monitoring (D.1.7, pg. 29)(now, pg. 31)

Does the Compliance Response Plan apply or is it the Preventive Maintenance Plan that applies? Aurora Casket believes that the Compliance Response Plan is redundant with the requirements set forth in the Preventive Maintenance Plan and also inappropriate since there are no emission limits placed on Aurora Casket in the permit.

Subparagraph (c) states "The Compliance Response Plan for this unit . . ." Aurora Casket requests that the term "this unit" be defined.

Response 31:

The singular unit has been changed to **these units** in Condition D.1.7(b). The units refer to all of the facilities listed in Section D.1

Comment 32:

Record Keeping Requirements (D.1.8, pg. 29)(now, pg.31)

This paragraph references paragraph D.1.4 and we feel this may be a typo. It seems that the condition requiring record keeping is set forth in D.1.5. We request clarification as to the proper paragraph to be referenced.

In subparagraph (a)(1) we request that the word "shall" be changed to "may" in the second sentence. Retaining all of the referenced documents is unnecessary and inappropriate. We request that subparagraph (3) be removed since casket manufacturers are exempt from this requirement.

We also would like clarification as to what IDEM would like to see recorded on a log of "daily over-spray operations" as stated in subparagraph (b).

Response 32:

Condition D.1.8 (now Condition D.1.7) part (a) has been deleted since there is no VOC emission limit in Section D.1.

Daily observations should record if an overspray emission, evidence of overspray emission, or other noticeable change in overspray emissions is observed.

In addition, Condition D.1.8(b) (now Condition D.1.7(a)) has been revised as follows:

D.1.8 Record Keeping Requirements

- (a)(b) To document compliance with Conditions D.1.1 and D.1.6, the Permittee shall maintain a log of ~~weekly~~ **daily** overspray observations, daily and ~~monthly~~ **weekly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

TECHNICAL SUPPORT DOCUMENT

Comment 33:

Source Background and Description (pg. 1 of 9)

The Source Background and Description states "The Office of Air Management (OAM) has reviewed a Part 70 permit application from Aurora Casket Company relating to the operation of burial casket and shipping case manufacturing source." We request the words "and shipping case" be removed from this statement, since Aurora Casket does not manufacture shipping cases.

Response 33:

The Permit has been corrected, and this Addendum updates the Technical Support Document (TSD) without reissuing the TSD.

Comment 34:

Permitted Emissions Units and Pollution Control Equipment (pg. 1 of 9)

As requested above, Aurora Casket would like to know if the capacity description stated with each facility (emission unit) is for informational purposes only or if IDEM intends this to be an enforceable term/limit with respect to our permit. If this description is provided for informational reasons and is not an enforceable limit, we request that it be removed from the permit. If this is an enforceable term/limit, we request an explanation of why this would be an enforceable limit and concurrently this description would need correction.

Also, we would like to know if the spray gun technology listed with each facility (emission unit) is for informational purposes or if this is an enforceable term/limit of our permit. If this description is provided for reasons other than enforceability, we request that it be removed from the permit. If this is an enforceable term/limit, we request an explanation of why this would be an enforceable condition and concurrently this information would need correction.

Response 34:

See Response 3.

Comment 35:

Insignificant Activities (pg. 2 of 9)

Aurora Casket maintains an underground storage tank with a capacity greater than those stated in subparagraph (e). Calculated potential emissions from that facility (tank) are insignificant.

Paragraph (t)(3) lists a five-stage washer under other activities or categories not previously identified. Aurora Casket requests that this be corrected to reflect that it is a six-stage washer since there are six stages to this operation.

We also request clarification as to whether MIG welding should be included as an insignificant source of Hazardous Air Pollutant emissions.

Response 35:

Paragraph (t)(3) listed a five-stage washer and has been changed to a **six**-stage-washer.

MIG welding has been added to the insignificant activities list as an insignificant activity with a state rule in Condition A.3 of the permit.

See comment 39 and response.

Comment 36:

Existing Approvals (pg. 3 of 9)

Aurora Casket received an amendment to permits OP 15-08-90-0115 and 15-08-90-0116 on October 7, 1996. Although there has not been an identification number assigned to this permit amendment, Aurora Casket requests that it be included under existing approvals.

Response 36:

The amendment has been referenced as:

An amendment to permits OP 15-08-90-0115 and 15-08-90-0116 issued on October 7, 1996.

Comment 37:

County Attainment Status (pg. 7 of 9)

Aurora Casket understands that Dearborn County is classified as Secondary Non Attainment for TSP. We would like IDEM to clarify if Dearborn County is Attainment or Non Attainment for this pollutant.

Response 37:

U.S. EPA no longer regulates TSP. This designation was eliminated for several counties, including Dearborn County, in June 1997 (62 FR 18521). Therefore, the pollutant of interest is PM₁₀ and no longer TSP and Dearborn County is designated as attainment for PM₁₀.

Comment 38:

Appendix A Potential Emission Calculations (pg. 1 - 4 of TSD)

We believe there may be some inaccuracies in the spreadsheets contained in Appendix A of the Technical Support Document, as well as the various tables of emissions based upon the spreadsheets. Aurora Casket requests an explanation of the purpose of the spreadsheet and its impact on our permit.

Response 38:

The information provided in the application was used to calculate the potential emissions and emissions after the stated controls to determine applicability of rules and make sure that the source has Title V exposure. See additional comment and response 40.

On April 6 and May 5, 1998, Carolyn Auburn of Aurora Casket Company, Inc. submitted additional comments on the proposed Part 70 Operating Permit. The comments are as follows:

Comment 39:

Aurora Casket maintains an Underground Storage Tank containing diesel fuel with a capacity of 20,000 gallons. This tank was installed in August of 1990. Calculated maximum potential VOC emissions from this facility (tank) are about 80 pounds per year from working losses and about 80 pounds per year from the fuel dispensing to the fleet. Working losses were calculated using EPA's Tanks 3 program. Dispensing losses were calculated based on a VOC emission factor from FIRE version 5.1 of 0.03 pound of VOC per 1,000 gallons of fuel. Breathing losses from the underground storage tank were assumed to be zero.

Response 39:

The Underground Storage Tank containing diesel fuel with a capacity of 20,000 gallons has been added to the permit in Section A.2 and Section D.2. Condition D.2.1 will be added as well as pursuant to 40 CFR §§ 60.110b-117b which was not in the original application. This tank has been added to Condition A.2 as item (i):

(i) One (1) diesel fuel storage tank, installed in August 1990, capacity: 20,000 gallons.

D.2.1 Record Keeping Requirements

The Permittee shall maintain records at the source sufficient to demonstrate compliance with 40CFR Part 60.110b (NSPS Subpart Kb) for the 20,000-gallon diesel storage tank.

Comment 40:

This item relates to comment No. 38 in our March 26th letter which indicated that there may be some inaccuracies in the spreadsheets contained in Appendix A of the Technical Support Document (TSD), as well as the various tables of emissions summaries that are based upon the spreadsheets. We are happy to discuss this with you in greater detail, but it is important to keep in mind that the main point of our comment was to request an explanation of the purpose of the spreadsheets and emissions summaries in the TSD and their impact, if any, on the Part 70 operating permit for our plant.

You indicated in your letter that all calculations contained in the spreadsheets that comprise Appendix A of the TSD are based upon the information provided in the application Forms PI-19 for the coating operations. You further questioned whether there had been any changes in our coating operations warranting the submittal of revised application forms due to the fact we indicated there are some inaccuracies in the TSD emissions summaries. As an initial matter, we do not believe the spreadsheets could have been prepared based solely upon the information contained in Forms PI-19. Preparation of the spreadsheets required certain assumptions concerning our operation, such as coating usage, etc. in addition to the information in Forms PI-19.

In our view, the inaccuracies are probably relatively minor and simply reflect assumptions made in calculating the estimated emissions and minor changes in the coatings being used over the last year and a half since the application was submitted.

We do not believe that there is a need to revise or resubmit any application forms in response to this item. The information in Forms PI-19 remains correct. None of the facilities (emission units) has changed since submittal of the application. Some coatings may have changed to reduce or change VOC content. Coatings are changed as improvements are made and customer needs change. However, overall emissions from these units have not increased since that time.

Importantly, your "concern" misses the point of our comment. The main purpose of our comment was to request an explanation of the purpose of the spreadsheets/emissions summary in the TSD and their impact, if any, on our Part 70 operating permit. We still have the same question. Our understanding is that the information in the TSD is for informational purposes only and provides background on the Title V source. The information in the TSD does not trigger any operational limitations/requirements in the permit itself. Consequently, even though there may be some relatively minor inaccuracies in the spreadsheets and emissions summaries prepared for the TSD, it does not change our status under the Part 70 operating permit program. It is important that we receive an answer to our questions before we can adequately discuss this issue further.

Response 40:

The purpose of the spreadsheets containing the emission calculations is to determine the potential emissions of the regulated pollutants before and after controls. These potential emissions determine the applicability of Part 70 as well as the applicable State Rules, or what rules may not apply to an individual emission unit or the entire source. Prevention of Significant Deterioration applicability as well as the source status for HAPs (major or minor), for example, is also determined. In addition, should a Best Available Control Technology analysis be required pursuant to 326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facility) to establish the baseline. In addition, should modifications of an existing major source be proposed, the potential emissions after controls are compared to the Prevention of Significant Deterioration significant levels to determine if the modification requires Prevention of Significant Deterioration review.

Comment 41:

This item relates to comment Nos. 3, 26, and 34 in our March 26th letter regarding the capacity listed for the spray booths to coat burial caskets and other parts. First let me say that there have been no changes to the spray booths that have increased their capacity to emit VOCs or HAPs at the plant. Therefore, there is no reason to revise or resubmit any application forms.

As I am sure you are aware, the number of caskets that may be coated in a spray booth depends upon various factors, including the coating being used. Aurora Casket is seeking to permit emissions from the entire Marsh Road plant, not the number of burial caskets that may be coated per hour in each spray booth. Consequently, our comments requested clarification concerning the impact of indicating in the Part 70 permit a "capacity" of caskets that could be coated per hour in each coating unit.

We understand that listing a "capacity" of caskets per hour is for informational purposes only, and is not an operational limitation in the permit. This was also our understanding when completing the application. This description should not be an operational limitation in the permit because we are permitting emissions from the plant and not the number of caskets being coated per hour. Over

time, coatings may change and other changes may be implemented that will allow Aurora Casket to process more burial caskets than the current capacity, while still emitting less VOCs and/or HAPs. This should be expressly allowed under our Part 70 permit since the overall emissions will not be increasing. This is also an important part of attaining operational flexibility under the Part 70 permit.

Response 41:

See Response 3.

Comment 42:

The final item relates to comment No. 35 in our March 25th letter regarding the diesel fuel storage tank located at the plant. You indicated in your letter that this emissions unit will be added to the Part 70 permit and also will require record keeping pursuant to 40 CFR §§ 60.110b-.117b. Aurora Casket does not believe any response is necessary to this item. Please advise if this is incorrect.

Response 42:

See Response 39.

On March 16, 1999, Mark Frye of Aurora Casket Company, Inc. submitted an additional comment on the proposed Part 70 Operating Permit. The comment is as follows:

Comment 43:

Remove from Section D.1b the facility known as EU-2, primer booth #2, which has been removed and is no longer in operation at our plant. All other descriptions in this section (D.1a through D.1h) are still accurate and do not need to be changed. Please remove D.1.b from our operating permit.

Response 43:

Since A.2(b) and D.1(b) was the primer booth #1, known as EU-2, verification was made during the last week in May that primer booth #1 was removed and not primer booth #2 which is known as EU-3. Therefore, Sections A.2 and D.1 have had EU-2 removed as follows and the remainder of the equipment list was re-lettered:

(b) ~~One (1) primer booth #1, known as EU-2, equipped with airless spray applicators and a waterwash curtain for overspray control, exhausting through Stacks 2A and 2B, capacity: 30 burial caskets per hour.~~

In addition, Condition D.1.6 has been revised to remove reference to Stacks 2A and 2B associated with EU-2.

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters and waterwashes, weekly observations shall be made of the overspray from the surface coating booth stacks 1A, 1B, ~~2A, 2B~~, 3A, 3B, 4A through 4D, 5A, 5B, 6A, 7A, 8A, and 8B while these spray booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

**Appendix A: Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Aurora Casket Company, Inc.
Address City IN Zip: 10944 Marsh Road, Aurora, IN 47001
Part 70: T029-7636
Plt ID: T029-00001
Reviewer: Mark L. Kramer
Date: December 13, 1996**

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
Scratch Primer Booth																
High Build Scratch Sealer	7.17	92.00%	14.0%	78.0%	0.0%	20.00%	0.0417	30.0	5.59	5.59	7.00	167.91	30.64	0.79	27.96	75%
Primer Booth #1																
Gray Water Reduceable	10.00	22.29%	0.0%	22.3%	0.0%	75.00%	0.0167	30.0	2.23	2.23	1.12	26.80	4.89	4.26	2.97	75%
Primer Booth #2																
Gray Water Reduceable	10.00	22.29%	0.0%	22.3%	0.0%	75.00%	0.1500	30.0	2.23	2.23	10.03	240.73	43.93	38.29	2.97	75%
Color Booth																
White Color Coat	10.17	51.67%	0.0%	51.7%	0.0%	20.00%	0.2670	30.0	5.26	5.26	42.11	1010.61	184.44	43.13	26.29	75%
Black Color Coat	7.09	84.98%	0.0%	85.0%	0.0%	20.00%	0.2670	30.0	6.02	6.02	48.25	1158.05	211.34	9.34	30.12	75%
Dk. Copper Color Coat	7.09	81.21%	0.0%	81.2%	0.0%	20.00%	0.2670	30.0	5.76	5.76	46.11	1106.73	201.98	11.68	28.79	75%
Silver Color Coat	7.09	83.24%	0.0%	83.2%	0.0%	20.00%	0.2670	30.0	5.90	5.90	47.27	1134.41	207.03	10.42	29.51	75%
Diamond Blue Color Coat	7.09	83.88%	0.0%	83.9%	0.0%	20.00%	0.2670	30.0	5.95	5.95	47.63	1143.06	208.61	10.03	29.73	75%
Coral FB Color Coat	10.01	52.27%	0.0%	52.3%	0.0%	20.00%	0.2670	30.0	5.23	5.23	41.90	1005.61	183.52	41.90	26.16	75%
Pink FB Color Coat	10.17	51.54%	0.0%	51.5%	0.0%	20.00%	0.2670	30.0	5.24	5.24	42.00	1008.11	183.98	43.25	26.22	75%
Storm Blue Color Coat	7.09	83.38%	0.0%	83.4%	0.0%	20.00%	0.2670	30.0	5.91	5.91	47.35	1136.33	207.38	10.33	29.56	75%
Cedartone	7.09	83.19%	0.0%	83.2%	0.0%	20.00%	0.2670	30.0	5.90	5.90	47.23	1133.64	206.89	10.45	29.49	75%
Hyacinth FB	7.34	80.44%	0.0%	80.4%	0.0%	20.00%	0.2670	30.0	5.90	5.90	47.29	1134.98	207.13	12.59	29.52	75%
Leaf Rust FB	7.09	82.83%	0.0%	82.8%	0.0%	20.00%	0.2670	30.0	5.87	5.87	47.03	1128.83	206.01	10.67	29.36	75%
Turquoise FB	7.17	82.75%	0.0%	82.7%	0.0%	20.00%	0.2670	30.0	5.94	5.94	47.54	1140.94	208.22	10.85	29.68	75%
Lt. Copper FB	7.17	79.95%	0.0%	79.9%	0.0%	20.00%	0.2670	30.0	5.73	5.73	45.93	1102.30	201.17	12.62	28.67	75%
Gunmetal FB	7.09	82.73%	0.0%	82.7%	0.0%	20.00%	0.2670	30.0	5.87	5.87	46.98	1127.49	205.77	10.74	29.33	75%
Orchid FB	7.09	83.61%	0.0%	83.6%	0.0%	20.00%	0.2670	30.0	5.93	5.93	47.48	1139.41	207.94	10.19	29.64	75%
Cordova FB	7.17	79.90%	0.0%	79.9%	0.0%	20.00%	0.2670	30.0	5.73	5.73	45.91	1101.73	201.07	12.64	28.66	75%
Green Blend FB	7.17	82.55%	0.0%	82.6%	0.0%	20.00%	0.2670	30.0	5.92	5.92	47.43	1138.25	207.73	10.98	29.61	75%
Hunter Green HHR	7.09	89.29%	0.0%	89.3%	0.0%	20.00%	0.2670	30.0	6.33	6.33	50.70	1216.88	222.08	6.66	31.65	75%
Shade Booth																
WR Silver	8.34	37.88%	32.0%	5.9%	35.0%	25.00%	0.1080	30.0	0.75	0.49	1.59	38.12	6.96	36.76	1.96	50%
WR Diamond Blue	8.34	37.16%	32.0%	5.2%	35.0%	25.00%	0.1080	30.0	0.66	0.43	1.39	33.45	6.11	37.19	1.72	50%
WR Goldtone	8.42	36.16%	32.0%	4.2%	35.0%	25.00%	0.1080	30.0	0.54	0.35	1.14	27.26	4.97	38.16	1.40	50%
Gold Shade	7.75	66.10%	32.0%	34.1%	35.0%	33.80%	0.1080	30.0	4.07	2.64	8.56	205.50	37.50	18.64	7.82	50%
Hawthorne Met.	7.65	68.50%	32.0%	36.5%	35.0%	31.40%	0.1080	30.0	4.30	2.79	9.05	217.13	39.63	17.10	8.89	50%
Arapaho Copper	7.68	68.00%	32.0%	36.0%	35.0%	31.90%	0.1080	30.0	4.25	2.76	8.96	214.99	39.24	17.44	8.67	50%
Blue Ink	7.98	62.80%	32.0%	30.8%	35.0%	37.10%	0.1080	30.0	3.78	2.46	7.96	191.12	34.88	21.06	6.62	50%
Dk. Bronze Met.	7.68	66.30%	32.0%	34.3%	35.0%	33.60%	0.1080	30.0	4.05	2.63	8.53	204.84	37.38	18.36	7.84	50%
Red Velour Dye	7.17	93.33%	32.0%	61.3%	35.0%	25.00%	0.1080	30.0	6.77	4.40	14.25	342.05	62.42	3.39	17.60	50%
Topaz Dye	7.17	93.33%	32.0%	61.3%	35.0%	25.00%	0.1080	30.0	6.77	4.40	14.25	342.05	62.42	3.39	17.60	50%
Blue Dye	7.17	93.30%	32.0%	61.3%	35.0%	25.00%	0.1080	30.0	6.76	4.40	14.25	341.90	62.40	3.41	17.59	50%
Topcoat Booth																
Topcoat DH-32-17	7.34	80.68%	0.0%	80.7%	0.0%	20.00%	0.2500	30.0	5.92	5.92	44.41	1065.78	194.50	11.65	29.61	75%
Touch-up Booth																
White Color Coat	10.17	51.67%	0.0%	51.7%	0.0%	20.00%	0.0170	30.0	5.26	5.26	2.68	64.35	11.74	5.49	26.29	50%
Black Color Coat	7.09	84.98%	0.0%	85.0%	0.0%	20.00%	0.0170	30.0	6.02	6.02	3.07	73.73	13.46	1.19	30.12	50%
Dk. Copper Color Coat	7.09	81.21%	0.0%	81.2%	0.0%	20.00%	0.0170	30.0	5.76	5.76	2.94	70.47	12.86	1.49	28.79	50%
Silver Color Coat	7.09	83.24%	0.0%	83.2%	0.0%	20.00%	0.0170	30.0	5.90	5.90	3.01	72.23	13.18	1.33	29.51	50%
Diamond Blue Color Coat	7.09	83.88%	0.0%	83.9%	0.0%	20.00%	0.0170	30.0	5.95	5.95	3.03	72.78	13.28	1.28	29.73	50%
Coral FB Color Coat	10.01	52.27%	0.0%	52.3%	0.0%	20.00%	0.0170	30.0	5.23	5.23	2.67	64.03	11.69	5.34	26.16	50%
Pink FB Color Coat	10.17	51.54%	0.0%	51.5%	0.0%	20.00%	0.0170	30.0	5.24	5.24	2.67	64.19	11.71	5.51	26.22	50%
Storm Blue Color Coat	7.09	83.38%	0.0%	83.4%	0.0%	20.00%	0.0170	30.0	5.91	5.91	3.01	72.35	13.20	1.32	29.56	50%
Cedartone	7.09	83.19%	0.0%	83.2%	0.0%	20.00%	0.0170	30.0	5.90	5.90	3.01	72.18	13.17	1.33	29.49	50%
Hyacinth FB	7.34	80.44%	0.0%	80.4%	0.0%	20.00%	0.0170	30.0	5.90	5.90	3.01	72.26	13.19	1.60	29.52	50%
Leaf Rust FB	7.09	82.83%	0.0%	82.8%	0.0%	20.00%	0.0170	30.0	5.87	5.87	2.99	71.87	13.12	1.36	29.36	50%
Turquoise FB	7.17	82.75%	0.0%	82.7%	0.0%	20.00%	0.0170	30.0	5.94	5.94	3.03	72.64	13.26	1.38	29.68	50%
Lt. Copper FB	7.17	79.95%	0.0%	79.9%	0.0%	20.00%	0.0170	30.0	5.73	5.73	2.92	70.18	12.81	1.61	28.67	50%
Gunmetal FB	7.09	82.73%	0.0%	82.7%	0.0%	20.00%	0.0170	30.0	5.87	5.87	2.99	71.79	13.10	1.37	29.33	50%
Orchid FB	7.09	83.61%	0.0%	83.6%	0.0%	20.00%	0.0170	30.0	5.93	5.93	3.02	72.55	13.24	1.30	29.64	50%
Cordova FB	7.17	79.90%	0.0%	79.9%	0.0%	20.00%	0.0170	30.0	5.73	5.73	2.92	70.15	12.80	1.61	28.66	50%
Green Blend FB	7.17	82.55%	0.0%	82.6%	0.0%	20.00%	0.0170	30.0	5.92	5.92	3.02	72.47	13.23	1.40	29.61	50%
Hunter Green HHR	7.09	89.29%	0.0%	89.3%	0.0%	20.00%	0.0170	30.0	6.33	6.33	3.23	77.48	14.14	0.85	31.65	50%

**Appendix A: Federal Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Aurora Casket Company, Inc.
Address City IN Zip: 10944 Marsh Road, Aurora, IN 47001
Part 70: T029-7636
Plt ID: T029-00001
Reviewer: Mark L. Kramer
Date: December 13, 1996**

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
Repair Booth																
Reflow Repair	7.67	85.86%	0.0%	85.9%	0.0%	14.00%	0.0170	30.0	6.59	6.59	3.36	80.64	14.72	1.21	47.06	50%
State Potential Emissions	Add worst case coating to all solvents										Worst-Case TOTAL:	134	3218	587	143	

Control Technology Emissions (Combustion)						Emission Factors						Emissions				
Type	Number	Capacity MMBtu/hr	Gas usage MMCF/yr	PM lb/MMCF	PM10 lb/MMCF	SO2 lb/MMCF	NOx lb/MMCF	VOC lb/MMCF	CO lb/MMCF	PM tons/yr	PM10 tons/yr	SO2 tons/yr	NOx tons/yr	VOC tons/yr	CO tons/yr	
Catalytic			0.0	3.0	3.0	0.6	100.0	5.3	35.0	0.0	0.0	0.0	0.0	0.0	0.0	
Thermal			0.0	3.0	3.0	0.6	140.0	2.8	20.0	0.0	0.0	0.0	0.0	0.0	0.0	
Total			0.0							0.0	0.0	0.0	0.0	0.0	0.0	
									Control Efficiency VOC	PM	Controlled VOC pounds per hour	Controlled VOC pounds per day	Controlled VOC tons/yr	Controlled Particulate tons/yr		
									0	0.98						

Controlled Emissions due to Surface Coating Operations and Controls

Controlled Total:

134	3218	587	2.86
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METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

HAP Emission Calculations

Part 70: T029-7636
Pit ID#: T029-00001

Company Name: Aurora Casket Company, Inc.
Plant Location: 10944 Marsh Road, Aurora, IN 47001
County: Dearborn
Permit Reviewer: Mark L. Kramer
Date: December 13, 1996

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % Triethylamine	Weight % Glycol Ethers	Weight %	Weight %	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MEK Emissions (tons/yr)	Triethylamine Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Emissions (tons/yr)	Emissions (tons/yr)
Scratch Primer Booth																	
High Build Scratch Sealer	7.17	0.0417	30.0	0.00%	44.00%	13.00%	0.00%	3.00%	0.00%	0.00%	0.00	17.29	5.11	0.00	1.18	0.00	0.00
Primer Booth #1																	
Gray Water Reduceable	10.00	0.0167	30.0	0.00%	0.00%	0.00%	0.00%	6.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	1.32	0.00	0.00
Primer Booth #2																	
Gray Water Reduceable	10.00	0.1500	30.0	0.00%	0.00%	0.00%	0.00%	6.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	11.83	0.00	0.00
Color Booth																	
White Color Coat	10.17	0.2670	30.0	7.00%	18.00%	0.00%	0.00%	0.00%	0.00%	0.00%	24.99	64.25	0.00	0.00	0.00	0.00	0.00
Black Color Coat	7.09	0.2670	30.0	16.00%	3.00%	21.00%	0.00%	0.00%	0.00%	0.00%	39.79	7.46	52.23	0.00	0.00	0.00	0.00
Dk. Copper Color Coat	7.09	0.2670	30.0	15.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	37.31	0.00	47.25	0.00	0.00	0.00	0.00
Silver Color Coat	7.09	0.2670	30.0	15.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	37.31	0.00	47.25	0.00	0.00	0.00	0.00
Diamond Blue Color Coat	7.09	0.2670	30.0	16.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	39.79	0.00	49.74	0.00	0.00	0.00	0.00
Coral FB Color Coat	10.01	0.2670	30.0	7.00%	18.00%	0.00%	0.00%	0.00%	0.00%	0.00%	24.58	63.20	0.00	0.00	0.00	0.00	0.00
Pink FB Color Coat	10.17	0.2670	30.0	7.00%	18.00%	0.00%	0.00%	0.00%	0.00%	0.00%	24.99	64.25	0.00	0.00	0.00	0.00	0.00
Storm Blue Color Coat	7.09	0.2670	30.0	16.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	39.79	0.00	47.25	0.00	0.00	0.00	0.00
Cedartone	7.09	0.2670	30.0	16.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	39.79	0.00	47.25	0.00	0.00	0.00	0.00
Hyacinth FB	7.34	0.2670	30.0	15.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	38.62	0.00	48.92	0.00	0.00	0.00	0.00
Leaf Rust FB	7.09	0.2670	30.0	16.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	39.79	0.00	49.74	0.00	0.00	0.00	0.00
Turquoise FB	7.17	0.2670	30.0	15.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	37.75	0.00	47.81	0.00	0.00	0.00	0.00
Lt. Copper FB	7.17	0.2670	30.0	14.00%	0.00%	18.00%	0.00%	0.00%	0.00%	0.00%	35.23	0.00	45.29	0.00	0.00	0.00	0.00
Gunmetal FB	7.09	0.2670	30.0	16.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	39.79	0.00	47.25	0.00	0.00	0.00	0.00
Orchid FB	7.09	0.2670	30.0	16.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	39.79	0.00	49.74	0.00	0.00	0.00	0.00
Cordova FB	7.17	0.2670	30.0	15.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	37.75	0.00	47.81	0.00	0.00	0.00	0.00
Green Blend FB	7.17	0.2670	30.0	16.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	40.26	0.00	50.33	0.00	0.00	0.00	0.00
Hunter Green HHR	7.09	0.2670	30.0	8.00%	23.00%	18.00%	0.00%	0.00%	0.00%	0.00%	19.90	57.20	44.77	0.00	0.00	0.00	0.00
Shade Booth																	
WR Silver	8.34	0.1080	30.0	0.00%	0.00%	0.00%	1.00%	7.00%	0.00%	0.00%	0.00	0.00	0.00	1.18	8.28	0.00	0.00
WR Diamond Blue	8.34	0.1080	30.0	0.00%	0.00%	0.00%	0.00%	7.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	8.28	0.00	0.00
WR Goldtone	8.42	0.1080	30.0	0.00%	0.00%	0.00%	0.00%	7.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	8.37	0.00	0.00
Gold Shade	7.75	0.1080	30.0	25.00%	6.00%	0.00%	0.00%	0.00%	0.00%	0.00%	27.50	6.60	0.00	0.00	0.00	0.00	0.00
Hawthorne Met.	7.65	0.1080	30.0	18.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	19.54	0.00	0.00	0.00	0.00	0.00	0.00
Arapaho Copper	7.68	0.1080	30.0	29.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	31.61	0.00	0.00	0.00	0.00	0.00	0.00
Blue Ink	7.98	0.1080	30.0	35.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	39.64	0.00	0.00	0.00	0.00	0.00	0.00
Dk. Bronze Met.	7.68	0.1080	30.0	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	21.80	0.00	0.00	0.00	0.00	0.00	0.00
Red Velour Dye	7.17	0.1080	30.0	44.00%	13.00%	0.00%	0.00%	3.00%	0.00%	0.00%	44.79	13.23	0.00	0.00	3.05	0.00	0.00
Topaz Dye	7.17	0.1080	30.0	44.00%	13.00%	0.00%	0.00%	3.00%	0.00%	0.00%	44.79	13.23	0.00	0.00	3.05	0.00	0.00
Blue Dye	7.17	0.1080	30.0	44.00%	13.00%	0.00%	0.00%	3.00%	0.00%	0.00%	44.79	13.23	0.00	0.00	3.05	0.00	0.00
Topcoat Booth																	
Topcoat DH-32-17	7.34	0.2500	30.0	32.00%	12.00%	0.00%	0.00%	0.00%	0.00%	0.00%	77.15	28.93	0.00	0.00	0.00	0.00	0.00
Touch-up Booth																	
White Color Coat	10.17	0.0170	30.0	7.00%	18.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59	4.09	0.00	0.00	0.00	0.00	0.00
Black Color Coat	7.09	0.0170	30.0	16.00%	3.00%	21.00%	0.00%	0.00%	0.00%	0.00%	2.53	0.48	3.33	0.00	0.00	0.00	0.00
Dk. Copper Color Coat	7.09	0.0170	30.0	15.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	2.38	0.00	3.01	0.00	0.00	0.00	0.00
Silver Color Coat	7.09	0.0170	30.0	15.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	2.38	0.00	3.01	0.00	0.00	0.00	0.00
Diamond Blue Color Coat	7.09	0.0170	30.0	16.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	2.53	0.00	3.17	0.00	0.00	0.00	0.00
Coral FB Color Coat	10.01	0.0170	30.0	7.00%	18.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.56	4.02	0.00	0.00	0.00	0.00	0.00
Pink FB Color Coat	10.17	0.0170	30.0	7.00%	18.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.59	4.09	0.00	0.00	0.00	0.00	0.00
Storm Blue Color Coat	7.09	0.0170	30.0	16.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	2.53	0.00	3.01	0.00	0.00	0.00	0.00

HAP Emission Calculations

Part 70: T029-7636

Pit ID#: T029-00001

Company Name: Aurora Casket Company, Inc.
 Plant Location: 10944 Marsh Road, Aurora, IN 47001
 County: Dearborn
 Permit Reviewer: Mark L. Kramer
 Date: December 13, 1996

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % Triethylamine	Weight % Glycol Ethers	Weight %	Weight %	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MEK Emissions (tons/yr)	Triethylamine Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Emissions (tons/yr)	Emissions (tons/yr)
Cedartone	7.09	0.0170	30.0	16.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	2.53	0.00	3.01	0.00	0.00	0.00	0.00
Hyacinth FB	7.34	0.0170	30.0	15.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	2.46	0.00	3.11	0.00	0.00	0.00	0.00
Leaf Rust FB	7.09	0.0170	30.0	16.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	2.53	0.00	3.17	0.00	0.00	0.00	0.00
Turquoise FB	7.17	0.0170	30.0	15.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	2.40	0.00	3.04	0.00	0.00	0.00	0.00
Lt. Copper FB	7.17	0.0170	30.0	14.00%	0.00%	18.00%	0.00%	0.00%	0.00%	0.00%	2.24	0.00	2.88	0.00	0.00	0.00	0.00
Gunmetal FB	7.09	0.0170	30.0	16.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	2.53	0.00	3.01	0.00	0.00	0.00	0.00
Orchid FB	7.09	0.0170	30.0	16.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	2.53	0.00	3.17	0.00	0.00	0.00	0.00
Cordova FB	7.17	0.0170	30.0	15.00%	0.00%	19.00%	0.00%	0.00%	0.00%	0.00%	2.40	0.00	3.04	0.00	0.00	0.00	0.00
Green Blend FB	7.17	0.0170	30.0	16.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	2.56	0.00	3.20	0.00	0.00	0.00	0.00
Hunter Green HHR	7.09	0.0170	30.0	8.00%	23.00%	18.00%	0.00%	0.00%	0.00%	0.00%	1.27	3.64	2.85	0.00	0.00	0.00	0.00
Repair Booth																	
Reflow Repair	7.67	0.0170	30.0	33.00%	15.00%	0.00%	0.00%	17.00%	0.00%	0.00%	5.66	2.57	0.00	0.00	2.91	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TOTALS:	(tons/yr):	170	130	60.7	1.18	25.6	0.000	0.000
	(lb/hr):	38.9	29.8	13.9	0.270	5.85	0.000	0.000
	(g/sec):	4.91	3.75	1.75	0.034	0.737	0.000	0.000

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs